



Joaquin Gonzalez <jgonzalez@msgpllc.com>

---

## Doe v. Musk

---

Joaquin Gonzalez <jgonzalez@msgpllc.com>

Tue, Oct 28, 2025 at 1:49 PM

To: "Siler, Jacob S. (CIV)" <Jacob.S.Siler@usdoj.gov>

Cc: "Lynch, Christopher M. (CIV)" <Christopher.M.Lynch@usdoj.gov>, Beth Stevens <bstevens@msgpllc.com>, "Wen, James J. (CIV)" <James.J.Wen@usdoj.gov>, "Hall, Christopher (CIV)" <Christopher.Hall@usdoj.gov>, "Hartlieb, Garry (USAVAE)" <Garry.Hartlieb@usdoj.gov>, Mimi Marziani <mmarziani@msgpllc.com>, Tianna Mays <tianna@statedemocracydefenders.org>, "andrew@statedemocracydefenders.org" <andrew@statedemocracydefenders.org>, "Norman@statedemocracydefenders.org" <norman@statedemocracydefenders.org>, "Heimann, Richard M." <rheimann@lchb.com>, "Rubin, Nicole M." <nrubin@lchb.com>

Hi Jacob. Please find attached Plaintiffs' draft stipulations. Feel free to send back redlines, or happy to find a time for a call if it would be useful.

Best,  
Joaquin Gonzalez

**CONFIDENTIAL: ATTORNEY-CLIENT PRIVILEGED; ATTORNEY WORK PRODUCT:** Emails and attachments received from us may be protected by the attorney-client privilege, as attorney work-product or based on other privileges or provisions of law. If you are not an intended recipient of this email, do not read, copy, use, forward or disclose the email or any of its attachments to others. Instead, immediately notify the sender by replying to this email and then delete it from your system. We strictly prohibit any unauthorized disclosure, copying, distribution or use of emails or attachments sent by us.

[Quoted text hidden]



---

**10.28.25 Plaintiffs' Draft Stipulations.docx**  
1652K

**Exhibit  
B**